

**REMARKS**

At the outset, the Examiner is thanked for the thorough review and consideration of the pending application. The Office Action dated August 8, 2007 has been received and its contents carefully reviewed.

Claim 1 is hereby amended. Support for the amendment can be found, for example, at Specification, page 5, lines 17-19, and Article 34 amended Specification, page 5, lines 5-7. No new matter has been added. Accordingly, claims 1-17 are currently pending, of which claims 4-17 are withdrawn from consideration. Reexamination and reconsideration of the pending claims are respectfully requested.

The Examiner rejected claims 1-3 under 35 U.S.C. § 112, second paragraph, as being indefinite. Not necessarily agreeing with the Examiner, Applicants, however, have amended claim 1 for the sole purpose of expediting prosecution. Applicants respectfully submit that claims 1-3 now more clearly define the subject matter. Applicants, therefore, respectfully request that the Examiner withdraw the rejection.

The Office Action rejected claims 1-3 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application Publication No. 2002/0093077 to Jung et al. (hereafter “*Jung*”) in view of U.S. Patent Application Publication No. 2004/0048978 to Okada et al. (hereafter “*Okada*”) and U.S. Patent Application Publication No. 2004/0048004 to Hosaka et al. (hereafter “*Hosaka*”). The Applicants respectfully traverse the rejection.

As required in M.P.E.P. § 2143.03, in order to “establish *prima facie* obviousness of the claimed invention, all the limitations must be taught or suggested by the prior art.” *Jung*, *Okada*, and *Hosaka*, either singularly or in combination, fail to teach or suggest every element of claims 1-3, and thus, cannot render these claims obvious.

Claim 1 recites, “Y is a di-valent organic group derived from aliphatic, alicyclic, or non-conjugated aromatic diamines having 3 to 30 carbon atoms and side chains have one or more ethylenically unsaturated bonds that may be crosslinked by a radical.” *Jung* fails to teach or suggest at least this element of claim 1. In fact, *Jung* discloses “Y is divalent, an aromatic or an aliphatic organic group, which are derived from diamine represented by the following

Formula 5:  $\text{H}_2\text{N}-\text{Y}-\text{NH}_2$ .” *Jung*, paragraph 0047. None of the exemplary compounds of Formula 5 has one or more ethylenically unsaturated bonds. See *Jung*, paragraph 0048. *Okada* and *Hosaka* do not cure the deficiency in *Jung* with respect to claim 1. *Okada* was cited for teaching the molecular weight of the polyimide precursor, and *Hosaka* was cited for teaching alicyclic tetracarboxylic acid. *Office Action*, page 4, lines 7-12. Accordingly, claim 1 is patentable over the combined teaching of *Jung*, *Okada*, and *Hosaka*. Claims 2 and 3, which depend from claim 1, are also patentable for at least the same reasons as claim 1.

Furthermore, *Jung* teaches away from the claimed precursor and thus, cannot render claimed precursor obvious. The presence of the ethylenically unsaturated bonds as claimed enables the claimed precursor to form negative-type photosensitive resin composition. See, for example, *Specification*, page 16, lines 19-15, and page 19, lines 14-17. Instead, *Jung* teaches that precursors for positive-type photosensitive polyimides. *Jung* teaches away from negative-type photoresist precursors stating “photosensitive polyimides are preferred over negative-type photosensitive polyimides, because positive-type photosensitive polyimides exhibit superior resolution.” *Jung*, paragraph 0011. One of ordinary skill in the art would not rely on *Jung* to arrive at the claimed precursor.

Applicants, therefore, respectfully request that the Examiner withdraw the rejection.

The application is in condition for allowance. Early and favorable action is respectfully solicited. If for any reason the Examiner finds the application other than in condition for allowance, the Examiner is requested to call the undersigned attorney at (202) 496-7500 to discuss the steps necessary for placing the application in condition for allowance. All correspondence should continue to be sent to the below-listed address.

Application No.: 10/550,591



Docket No.: 29137.096.00

If these papers are not considered timely filed by the Patent and Trademark Office, then a petition is hereby made under 37 C.F.R. § 1.136, and any additional fees required under 37 C.F.R. § 1.136 for any necessary extension of time, or any other fees required to complete the filing of this response, may be charged to Deposit Account No. 50-0911. Please credit any overpayment to deposit Account No. 50-0911. A duplicate copy of this sheet is enclosed.

Dated: November 8, 2007

Respectfully submitted,

By *Mark R. Kresloff* / Reg # 54,824  
for Mark R. Kresloff

Registration No.: 42,766  
McKENNA LONG & ALDRIDGE LLP  
1900 K Street, N.W.  
Washington, DC 20006  
(202) 496-7500  
Attorneys for Applicant